

THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
<http://www.courts.state.nh.us>

Court Name: Hillsborough - Superior Court-Southern District
Case Name: Sanjeev Lath v. NASHUA SOUP KITCHEN AND SHELTER, INC.
Case Number: 226-2021-CV-00246
(if known)

COMPLAINT

Requested: ☒ Jury Trial (as allowed by law) ☐ Bench Trial

- Plaintiff's Name Sanjeev Lath
Residence Address P.o.box 1508, Nashua, NH 03061
Mailing Address (if different) _____
Telephone Number (Home) (603) 459-9599 (Mobile) _____
- Defendant's Name NASHUA SOUP KITCHEN AND SHELTER, INC.
Residence Address 2 Quincy Street, Nashua, NH 03060
Mailing Address (if different) Po Box 3116, Nashua, NH 03061
Officer or Authorized Agent: Mary Slocum
- First thing that happened (in one sentence):
Claim amount: \$15,000.00. On March 30, 2018, Lath's home at 710 Northbrook Drive in
Manchester was foreclosed and sold at a public auction to Lath's loan servicer,
PennyMac Loan Services, LLC.
- Second thing that happened (in one sentence):
At all times relevant complained hereto, Complainant Sanjeev Lath was homeless with
no place of residence or permanent home.
- Third thing that happened (in one sentence):
Complainant Sanjeev Lath is a natural person with current residence at 60 Whitney
Street, Apt 2 in Nashua NH 03064

Continue on using separately numbered paragraphs (attach additional sheets if necessary).

Case Name: Sanjeev Lath V. NASHUA SOUP KITCHEN AND SHELTER, INC.**Case Number:** _____**COMPLAINT**

For the reasons stated in this Complaint, I request that the Court issue the following orders:

A. Describe the orders you want the Court to make:

Enter a Judgment against Defendant for violation of RSA 354-A:12 III (b)

Enter a Judgment against Defendant for violation of RSA 354-A:10 VI

A Judgment for compensatory damages

B. All other relief the Court deems fair and just. [See Attachment(s), 'Item A' (continued)]

Sanjeev Lath

Name of Filer

/s/ Sanjeev Lath

5/11/21

Signature of Filer

Date

(603) 459-9599

Law Firm, if applicable

Bar ID # of attorney

Telephone

P.o.box 1508

lath_sanjeev@outlook.com

Address

E-mail

Nashua, NH 03061

City

State

Zip code

Attachment Page 1 (of 2)To Complaint**Additional Claim Details**

6. At all times relevant complained hereto, defendant's employee, Giovanna Cruz was and still is the shelter manager of shelter owned and operated by Nashua Soup Kitchen and Shelter, Inc ("NSKS") being located at 58 Ash street in Nashua NH 03060.

7. At all times relevant, Nashua Soup and Kitchen and Shelter or NSKS is a homeless shelter, being operated by and thru their office located at 2 Quincy Street in Nashua NH 03061.

8. At all times relevant, Olga Cruz was the Program director and had oversight of the shelter.

9. At all times relevant, Olga Cruz is the biological sister of Giovanna Cruz and also Giovanna's supervising manager.

10. On or about April 26, 2018, Lath began staying at the homeless shelter being located at 58 Ash Street.

11. On May 1, 2018, Lath also disclosed to the Shelter manager, Giovanna that Lath had AIDS.

12. The Federal Fair Housing Act defines "handicap" as "a physical or mental impairment which substantially limits one or more of such person's major life activities."

13. On the same day, May 1, 2018, Lath requested a reasonable accommodation based upon his disability.

14. On May 31, 2018, Giovanna called Lath in her office and told Lath that he could no longer live at the shelter and that she did not care Lath has AIDS but that Lath cannot die at the shelter.

15. Giovanna Cruz went on to say, "God Bless You!"

16. Lath requested exemption from the rule requiring Lath to look for work because of Lath's disability.

17. During my stay at the shelter, Lath continued to perform all chores, keep all his appointments with shelter personnel and other social service

If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.

Attachment Page 2 (of 2)

To Complaint

agencies. (contd.)

Item A (continued)

A Judgment for general damages

If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.

**THE STATE OF NEW HAMPSHIRE
JUDICIAL BRANCH
SUPERIOR COURT**

Hillsborough Superior Court Southern District
30 Spring Street
Nashua NH 03060

Telephone: 1-855-212-1234
TTY/TDD Relay: (800) 735-2964
<http://www.courts.state.nh.us>



SUMMONS IN A CIVIL ACTION

Case Name: **Sanjeev Lath v Nashua Soup Kitchen and Shelter, Inc.**
Case Number: **226-2021-CV-00246**

Date Complaint Filed: May 11, 2021

A Complaint has been filed against Nashua Soup Kitchen and Shelter, Inc. in this Court. A copy of the Complaint is attached.

The Court ORDERS that ON OR BEFORE:

| | |
|-----------------------------------|--|
| June 26, 2021 | Sanjeev Lath shall have this Summons and the attached Complaint served upon Nashua Soup Kitchen and Shelter, Inc. by in hand or by leaving a copy at his/her abode, or by such other service as is allowed by law. |
| July 17, 2021 | Sanjeev Lath shall electronically file the return(s) of service with this Court. Failure to do so may result in this action being dismissed without further notice. |
| 30 days after Defendant is served | Nashua Soup Kitchen and Shelter, Inc. must electronically file an Appearance and Answer or other responsive pleading form with this Court. A copy of the Appearance and Answer or other responsive pleading must be sent electronically to the party/parties listed below. |

Notice to Nashua Soup Kitchen and Shelter, Inc.: If you do not comply with these requirements you will be considered in default and the Court may issue orders that affect you without your input.

Send copies to:

Sanjeev Lath
Nashua Soup Kitchen and
Shelter, Inc.

PoBox 1508 Nashua NH 03061
Po Box 3116 Nashua NH 03061

BY ORDER OF THE COURT

May 12, 2021

Amy M. Feliciano
Clerk of Court

(126849)

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**SANJEEV LATH
INSTRUCTIONS FOR SERVICE
BY THE SHERIFF'S DEPARTMENT**

Case Name: **Sanjeev Lath v Nashua Soup Kitchen and Shelter, Inc.**
Case Number: **226-2021-CV-00246**

Instructions for: Sanjeev Lath

The attached Summons must be sent to the Sheriff's Department for service. Service must be completed on or before **June 26, 2021**.

Further action is required by you

You must:

- **Print two copies of the Summons per defendant**
- **Print two copies of the Notice to Defendant per defendant**
- **Print two copies of the Complaint filed with the Court per defendant**
- **Make two packets for service. Each packet should contain:**
 - **One Summons**
 - **Once Notice for Defendant**
 - **One Complaint filed with the Court**
- **Mail or hand deliver the packets to the Sheriff's Department in the county where each defendant resides.**

Sheriff Departments in New Hampshire:

[Belknap County Sheriff's Department:](#)

[Carroll County Sheriff's Department:](#)

[Cheshire County Sheriff's Department:](#)

[Coos County Sheriff's Department:](#)

[Grafton County Sheriff's Department:](#)

[Hillsborough County Sheriff's Department:](#)

[Merrimack County Sheriff's Department:](#)

[Rockingham County Sheriff's Department:](#)

[Strafford County Sheriff's Department:](#)

[Sullivan County Sheriff's Department:](#)

If one or more of the parties resides out of state, please click [here](#) for the requirements

Service must be made upon the defendant before **June 26, 2021**.

If the Sheriff is unable to complete service by **June 26, 2021** you will receive a "Notice of Incomplete Service" from the Sheriff's Department. You may request that new paperwork be issued by electronically filing a Request for Documents. There is a fee for this request.

The Sheriff will mail the 'Return of Service' to you. You **MUST** electronically file the 'Return of Service' with the court by July 17, 2021.

If service is not made as directed, no further action will occur and the case may be dismissed by the court.

Important Service Information for Sheriff

Do not file this with the court

Provide this information to the Sheriff's Department.

See Instructions for Service for more information.

PLEASE PRINT CLEARLY

Date: _____

Case #: _____

Who are you requesting to be served?

Please provide whatever information you know

Name: _____

Address for service (no P.O. boxes):

_____ APT #: _____

Home phone #: _____ Cell phone #: _____

Sex: ☐ Male ☐ Female Race: _____

Last 4 digits of SS#: xxx-xx- _____ D.O.B. _____

Work name & address:

Special instructions for service (i.e. directions, best time to serve, cautions, etc.):

Vehicle description/license plate:

Your Information:

Name (please print): _____

Residential address:

Mailing address:

Phone number to contact you during business hours:

_____ Alternate #: _____

Signature

◆IN-HAND SERVICE WILL INCUR EXTRA COSTS DUE TO ADDITIONAL TRAVEL◆

SHERIFF OFFICE USE ONLY: (This will vary by Sheriff's Office)

Fees Paid: \$ _____ Cash #: _____ Check#: _____

Id#: _____ Waiver: _____ Money Order#: _____ Credit Card: _____

Sheriff File # _____ Authorization #: _____

Instructions for filing the Return of Service:

If you are working with an attorney, they will guide you on the next steps. If you are going to represent yourself in this action, go to the court's website: www.courts.state.nh.us, select the Electronic Services icon and then select the option for a self-represented party.

1. Select "I am filing into an existing case". Enter 226-2021-CV-00246 and click Next.
2. When you find the case, click on the link follow the instructions on the screen. On the "What would you like to file?" screen, select "File Other Document" and choose "Return of Service".
3. Scan the Return of Service packet and follow the instructions in the electronic filing program to upload the Return of Service to complete your filing.
4. If the sheriff was unable to serve the paperwork, you can request new paperwork by filing a Request for Documents. On the "What would you like to file?" screen, select "File Other Document" and choose "Request for Reissued Summons" from the menu and upload the Request for Documents form.

FAILURE TO FILE THESE DOCUMENTS MAY RESULT IN YOUR CASE BEING DISMISSED.

May 12, 2021

Date

Amy M. Feliciano

Clerk of Court

You can access documents electronically filed through our Case Access Portal by going to <https://odypa.nhecourt.us/portal> and following the instructions in the User Guide. In that process you will register, validate your email, request access and approval to view your case. After your information is validated by the court, you will be able to view case information and documents filed in your case.

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NOTICE TO DEFENDANT

Case Name: **Sanjeev Lath v Nashua Soup Kitchen and Shelter, Inc.**
Case Number: **226-2021-CV-00246**

You have been served with a Complaint which serves as notice that this legal action has been filed against you in the **Hillsborough Superior Court Southern District**. Review the Complaint to see the basis for the Plaintiff's claim.

Each Defendant is required to electronically file an Appearance and Answer 30 days after service. You may register and respond on any private or public computer. For your convenience, there is also a computer available in the courthouse lobby.

If you are working with an attorney, they will guide you on the next steps. If you are going to represent yourself in this action, go to the court's website: www.courts.state.nh.us, select the Electronic Services icon and then select the option for a self-represented party.

1. Complete the registration/log in process. Click Register and follow the prompts.
2. After you register, click Start Now. Select **Hillsborough Superior Court Southern District** as the location.
3. Select "I am filing into an existing case". Enter **226-2021-CV-00246** and click Next.
4. When you find the case, click on the link and follow the instructions on the screen. On the "What would you like to file?" screen, select "File a Response to Civil Complaint". Follow the instructions to complete your filing.
5. Review your Response before submitting it to the court.

IMPORTANT: After receiving your response and other filings the court will send notifications and court orders electronically to the email address you provide.

A person who is filing or defending against a Civil Complaint will want to be familiar with the Rules of the Superior Court, which are available on the court's website: www.courts.state.nh.us.

Once you have registered and responded to the summons, you can access documents electronically filed by going to <https://odypa.nhecourt.us/portal> and following the instructions in the User Guide. In that process you will register, validate your email, request access and approval to view your case. After your information is validated by the court, you will be able to view case information and documents filed in your case.

If you have questions regarding this process, please contact the court at 1-855-212-1234.